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Attorneys for Defendants
 PFIZER INC., PHARMACIA & UPJOHN LLC
 and GREENSTONE LTD.

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

KAREN TOWLE,

Plaintiff,

vs.

WYETH PHARMACEUTICALS, INC.,
 WYETH-AYERST PHARMACEUTICALS,
 INC.; WYETH-AYERST INTERNATIONAL,
 INC.; WYETH LABORATORIES, INC.;
 WYETH PHARMACEUTICALS; WYETH,
 INC.; PHARMACIA & UPJOHN, INC.;
 PFIZER, INC.; BARR LABORATORIES, INC.;
 GREENSTONE LTD.; MICHELLE LUNA; and
 DOES 1 through 100, inclusive,

Defendants.

CASE NO. C 05-00614 SBA

**JOINT STIPULATION AND
 [PROPOSED] ORDER EXTENDING
 DEADLINES TO FILE OPPOSITION
 AND REPLY BRIEFS ON MOTION TO
 REMAND**

Date: June 7, 2005

Time: 1:00 p.m.

Courtroom: 3 (3rd Floor)

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1 Plaintiff Karen Towle ("Plaintiff") and Defendants Pfizer Inc., Pharmacia & Upjohn LLC
 2 (incorrectly named as Pharmacia & Upjohn Inc.), and Greenstone Ltd. (hereinafter collectively
 3 referred to as "Defendants"), by and through their respective attorneys, hereby stipulate and agree as
 4 follows:

5 1. On December 22, 2004, Plaintiff filed a Complaint against Defendants in San
 6 Francisco County Superior Court for fraudulent concealment, negligence, fraud, negligent
 7 misrepresentation, breach of express warranty, and loss of consortium;

8 2. On February 10, 2005, Defendants removed the action from San Francisco County
 9 Superior Court to the United States District Court, Northern District of California;

10 3. On April 21, 2005, Plaintiff filed a Notice of Motion and Motion to Remand Action
 11 to State Court ("Motion to Remand");

12 4. Defendants' opposition to the Motion to Remand currently is due on May 17, 2005;

13 5. Defendants have requested, and Plaintiff has agreed, to a three day extension of time
 14 for Defendants to respond to the Motion to Remand;

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6. Subject to the Court's approval, the time by which Defendants must file their Opposition Brief is extended three days, until **May 20, 2005**. The time by which Plaintiffs must file their Reply Brief also is extended three days, until **May 27, 2005**. The hearing date ^{is} ~~remains~~ ¹⁴ **June 7, 2005**.

Dated: May 11, 2005

KAYE SCHOLER LLP

By: Paul Gelb
Paul Gelb
Attorneys for Defendants
PFIZER INC., PHARMACIA & UPJOHN LLC
and GREENSTONE LTD.

Dated: May 11, 2005

PAUL & JANOFSKY

By: /s/
Michael B. Gurien
Attorneys for Plaintiff
KAREN TOWLE

IT IS SO ORDERED.

Dated: May 12, 2005

/s/ Sandra Brown Armstrong
HONORABLE SAUNDRA B. ARMSTRONG
UNITED STATES DISTRICT COURT JUDGE

KAYE SCHOLER LLP

6. Subject to the Court's approval, the time by which Defendants must file their Opposition Brief is extended three days, until May 20, 2005. The time by which Plaintiffs must file their Reply Brief also is extended three days, until May 27, 2005. The hearing date remains June 7, 2005.

Dated: May 11, 2005 KAYE SCHOLER LLP

By: /s/ Paul Gelb
Attorneys for Defendants
PFIZER INC., PHARMACIA & UPJOHN LLC
and GREENSTONE LTD.

Dated: May 11, 2005 PAUL & JANOFSKY

By: Michael B. Gurien
Michael B. Gurien
Attorneys for Plaintiff
KAREN TOWLE

IT IS SO ORDERED.

Dated: May __, 2005

HONORABLE SAUNDRA B. ARMSTRONG
UNITED STATES DISTRICT COURT JUDGE

KAYE SCHOLER LLP